

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Karon A. Simmons,
Debtor.

Case No. 23-11011-AMC

Chapter 13

Motion to Modify Plan After Confirmation

Debtor Karon A. Simmons, through her attorney, moves this Court as follows:

1. The Plan was confirmed on March 1, 2024.
2. The Debtor wishes to amend the plan to include post-petition mortgage arrears consistent with the stipulation filed at ECF No. 78 that was approved by the Court's order filed at ECF No. 80.
3. The Debtor therefore requests approval of the Third Amended Plan filed at ECF No. 82.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: October 11, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: /s/ Michael A. Cibik

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